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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ORIGINAL
FILE

In the Matter of
Administration of the
North American Numbering Plan

CC Docket No. 92-237

NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS'
INITIAL COMMENTS

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December 28, 1992

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NARUC's December 28, 1992 Initial Comments

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NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS
INITIAL COMMENTS

Pursuant to Sections 1.41, 1.49, and 1.401 of the Federal Communications Commission's ("FCC" or "Commission") Rules of Practice and Procedure, 47 C.F.R. Sections 1.41, 1.49, and 1.401 (1991), the National Association of Regulatory Utility Commissioners ("NARUC") respectfully files these comments in response to the FCC's October 9, 1992 Notice of Inquiry ("NOI") issued October 29, 1992 in the above captioned proceeding. (FCC 92-470):

I. INTEREST OF NARUC

NARUC is a quasi-governmental nonprofit organization founded in 1889. Members include those governmental bodies responsible for regulating carriers and utilities in all fifty States, the District of Columbia, Puerto Rico, and the Virgin Islands. NARUC's mission is to improve the quality and effectiveness of public utility regulation in America. Specifically, NARUC is composed of, inter alia, State and territorial officials charged with regulating telecommunications common carriers within their respective borders.

These officials have the obligation to assure that communications services and facilities required by the public convenience and necessity are established, and that service is furnished at just and reasonable rates.

The serious and unresolved issues concerning the current North American Numbering Plan's ("NANP") future implementation will, if left unresolved, seriously impact upon NARUC members' ability to adhere to their respective mandates to serve the public interest.

II. BACKGROUND

Bell Communications Research Corporation ("Bellcore" or "NANPA") is the administrator of the NANP. NANPA will likely assume the responsibility for administering the assignment of new codes required by the North American telecommunications industry, including Intermediate Signaling Network Identifier codes, assignments for the Public Switched Digital Service offerings, and personal communications services ("PCS").

The pending exhaustion of a number of the codes, including the NPA codes, and CIC codes, is causing the communications industry to spend untold millions of dollars to devise and eventually implement the chosen solutions. The financial burden of administering the NANP and making hardware and software changes throughout the industry to accommodate changes in the NANP ultimately falls on business and residential ratepayers.

As detailed in NARUC's original request, aside from the ultimate impact on ratepayers, there are numerous other critical issues concerning the NANP and the NANPA requiring regulators' interest.

On September 21, 1991, because (1) it is possible that the plan ultimately implemented may favor particular industry players, (2) of the potential impact on ratepayers and the corresponding need for the views of state regulators, user, and other affected industry groups to be reflected in NANP actions, and (3) because the FCC entertains complaints regarding industry decisions affecting the NANP, NARUC asked the FCC to initiate the instant NOI seeking information and comment regarding the many issues surrounding NANP administration.

In response, on October 29, 1992, the FCC issued an NOI. Phase one of the NOI focuses on who should administer the NANP, the numbering scheme for PCS, and local number portability. Phase two of the NOI focuses on the future development of Carrier Identification Codes ("CIC"). Subsequently, in November 1992, NARUC adopted a resolution addressing the issues raised in the NOI. A copy of that resolution is attached as Appendix A.

The resolution begins by commending the FCC on its timely investigation into the emerging issues raised by NANP administration.

III. DISCUSSION

A. FUNDING - Based Upon Some Fair Allocation of Cost to Users:

The financial burden of administering the NANP and making hardware and software changes throughout the industry to accommodate changes in the NANP ultimately flows to the ratepayers. NARUC contends that funding for NANPA should be based upon some fair allocations of costs to those using the resources. The allocation of costs should be based upon several factors including the proportion of the resource used, the scarcity of the numbers involved, and the potential value of any commercial use.

B. ADMINISTRATION - Transferred to Neutral Third Party:

Although Bellcore has done an excellent job as administrator, because of the inherent and emerging conflict of interest posed by the need for numbering resources by Bellcore's owners and their competitors, evaluation of alternative methods of administration is needed. NARUC recommends that the future administration of the NANP be transferred to a neutral third party.

C. PCS NUMBERING - Develop Guidelines for OC Assignments within NON-GEOGRAPHIC Area Codes.

The NOI requests Phase I comments on PCS numbering and local number portability, but not on the allocation of office codes. The FCC has requested Bellcore to develop assignment guidelines for the assignment of office codes within geographic NPAs, but has made no similar request regarding the assignment of office codes within NON-GEOGRAPHIC NPAs. PCS numbering and local number portability are both issues related to the NON-GEOGRAPHIC use of telephone numbers.

Currently, there are no industry agreed upon guidelines in effect for the assignment of office codes for PCS within non-geographic area codes. Accordingly, NARUC respectfully requests that the FCC immediately take the necessary steps to get the industry to develop and achieve consensus on assignment guidelines for the assignment of office codes within non-geographic area codes for PCS.

D. CARRIER IDENTIFICATION CODES - Broader Approach Needed.

Phase Two of the NOI seeks comment on Carrier Identification Codes ("CIC"). The current three digit, and the future four digit, CIC codes are issued to any purchaser of access (just as ten digit telephone numbers are issued to purchasers of telephone service) so that telecommunications traffic can be routed to that purchaser. These codes are essentially abbreviated telephone numbers used to route telephone traffic to purchasers of access.

The supply of available CICs, even when increased to four digits, could be exhausted almost overnight. Currently, aside from long distance carriers, numerous government organizations, fast food companies, and many other organizations that are not generally considered "carriers" have been issued CIC codes.

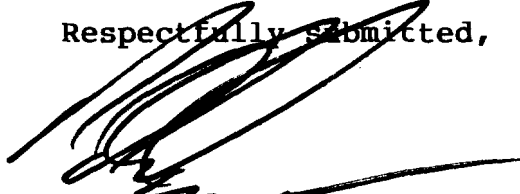
A drastic increase in the demand for CIC codes can be anticipated when other government organizations and businesses recognize the value of the services that can be provided through the use of these codes.

Accordingly, NARUC recommends that the FCC, in cooperation with the other 17 countries in World Zone 1, take a much broader long range look at all the CIC codes (not just FGD) as well as the dialing plan and the numbering plan so as to develop a comprehensive plan that includes all of the keystrokes or rotary dial pulse that ratepayers must use to place telephone calls.

IV. CONCLUSION:

NARUC respectfully requests that the FCC carefully consider and implement the suggestions discussed above.

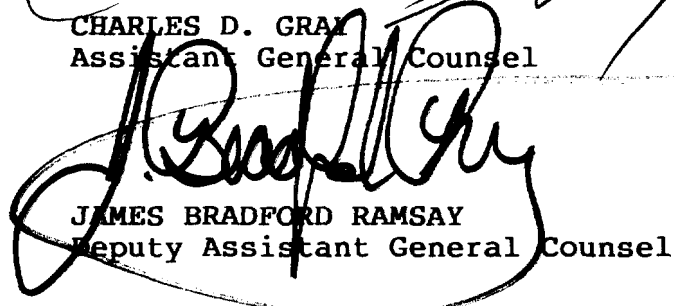
Respectfully Submitted,



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APPENDIX A

NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONER'S

NOVEMBER 1992

RESOLUTION CONCERNING ADMINISTRATION OF THE
NORTH AMERICAN NUMBERING PLAN

**Resolution Concerning Administration of the
North American Numbering Plan (NANP)**

WHEREAS, The Bell Communications Research Corporation (Bellcore) was created in 1983 as a result of a consent decree between AT&T and the United States Department of Justice; and

WHEREAS, The Plan of reorganization stipulated that Bellcore should be in charge of administration of the North American Numbering Plan (NANP) for the telephone industry; and

WHEREAS, Bellcore (NANP group and other groups) administers the assignments of various numbering codes that are of critical importance to the telecommunications industry in North America; and

WHEREAS, At NARUC's request, the FCC has initiated a Notice of Inquiry (NOI) into Bellcore's administration of the NANP; and

WHEREAS, Phase one of the NOI focuses on who should administer the NANP, the numbering scheme for Personal Communications Services (PCS), and local number portability; and

WHEREAS, Phase two of the NOI focuses on the future development of Carrier Identification Codes (CICs); and

WHEREAS, The financial burden of administering the NANP and making hardware and software changes throughout the industry to accommodate changes in the NANP ultimately flows to the ratepayers; and

WHEREAS, Both business and residence ratepayers face confusion and disruption in adapting to changes in the NANP caused by the exhaust of various numbering codes; and

WHEREAS, Funding for North American Numbering Plan Administration (NANPA) should be based upon some fair allocations of costs to those using the resources; and

WHEREAS, The allocation of costs should be based upon the proportion of the resource used, the scarcity of the numbers involved, and the potential value of any commercial use, and

WHEREAS, Although Bellcore has done an excellent job as administrator, because of the inherent and emerging conflict of interest posed by the need for numbering resources by Bellcore's owners and their competitors, evaluation of alternative methods of administration is needed; now, therefore, be it

RESOLVED, That the National Association of Regulatory Commissioners (NARUC), convened at its 104th Annual Convention in Los Angeles, California, commends the FCC on its timely investigation into these issues; and be it further

RESOLVED, That the NARUC recommends that the future administration of the NANP be transferred to a neutral third party.

PCS Numbering/Allocation of Office Codes

WHEREAS, The FCC NOI requests comments in Phase I on PCS numbering and local number portability, but not on the allocation of office codes; and

WHEREAS, The FCC has requested Bellcore to develop assignment guidelines for the assignment of office codes within geographic NPAs, but has made no similar request regarding the assignment of office codes within non-geographic NPAs; and

WHEREAS, PCS numbering and local number portability are both issues related to the non-geographic use of telephone numbers; now therefore be it

RESOLVED, That the National Association of Regulatory Utility Commissioners (NARUC), convened at its 104th Annual Convention in Los Angeles, California, recommends that the NARUC General Counsel, in reply comments regarding Phase I of the NOI, alert the FCC to the fact that there are no industry agreed upon guidelines in effect for the assignment of office codes for PCS within non-geographic area codes; and be it further

RESOLVED, That the NARUC General Counsel should request the FCC to immediately take the necessary steps to get the industry to develop and achieve consensus on assignment guidelines for the assignment of office codes within non-geographic area codes for PCS.

Carrier Identification Codes

WHEREAS, Phase Two of the NOI seeks comment on the Carrier Identification Codes (CIC); and

WHEREAS, The current three digit and the future four digit CIC codes are issued to any purchaser of access (just as ten digit telephone numbers are issued to purchasers of telephone service) so that telecommunications traffic can be routed to that purchaser; and

WHEREAS, In addition to long distance carriers, numerous government organizations, fast food companies, and many other organizations that are not generally considered "carriers" have been issued CIC codes; and

WHEREAS, A drastic increase in the demand for CIC codes can be anticipated when other government organizations and businesses recognize the value of the services that can be provided through the use of these codes; now, therefore be it

RESOLVED, That the National Association of Regulatory Utility Commissioners (NARUC), convened at its 104th Annual Convention in Los Angeles, California, recommends that the NARUC General Counsel, in reply comments regarding Phase II of the NOI, alert the FCC to the fact that the CIC codes are essentially abbreviated telephone numbers used to route telephone traffic to purchasers of access and that the supply of those numbers, even if increased to four digits, could be exhausted almost overnight; and be it further

RESOLVED, That NARUC's comments recommend that the FCC, in cooperation with the other 17 countries in World Zone 1, take a much broader long range look at all the CIC codes (not just FGD) as well as the dialing plan and the numbering plan so as to develop a comprehensive plan that includes all of the keystrokes or rotary dial pulse that ratepayers must use to place telephone calls.

Sponsored by the Committee on Communications
Adopted November 18, 1992

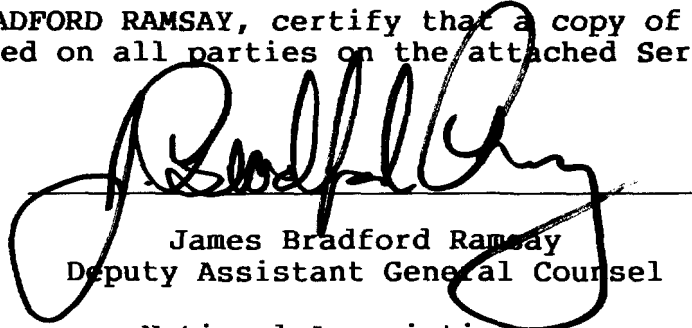
NATIONAL ASSOCIATION OF
REGULATORY UTILITY COMMISSIONERS
PETITION FOR NOTICE OF INQUIRY ADDRESSING ADMINISTRATION OF THE
NORTH AMERICAN NUMBERING PLAN

In the Matter of Administration of the
North American Numbering Plan

CC Docket No. 92-237

CERTIFICATE OF SERVICE

I, JAMES BRADFORD RAMSAY, certify that a copy of the foregoing
was served on all parties on the attached Service List.

A large, stylized handwritten signature in black ink, appearing to read 'James Bradford Ramsay', is written over a horizontal line.

James Bradford Ramsay
Deputy Assistant General Counsel

National Association of
Regulatory Utility Commissioners

December 28, 1992

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